

EXHIBIT

14

Kirk, Brittany E. (SHB)

From: Gromada, Veronica G. (SHB)
Sent: Tuesday, July 8, 2025 11:33 AM
To: Steven Cohn; Bret Stanley; Oot, Patrick L. (SHB); Shortnacy, Michael (SHB); Wikler, Jeremy (SHB); Priest Johnson, Kimberly (SHB); Cotton, Chris (SHB); Haider, Jay B. (SHB)
Cc: Roopal Luhana; Rachel Abrams; Sarah London; Andrew Kaufman; Meredith Stratigopoulos; Sara Peters; Marlene Goldenberg; Ellyn Hurd; Khaldoun Baghdadi; Alexandra Walsh; Brian Abramson; Beth Wilkins; Kirk, Brittany E. (SHB)
Subject: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Bret and Steve,

Thank you for taking the time to confer last week regarding the Protective Order violation dispute.

Based on the call, we understand your position to be that the names of Uber's policies, Knowledge Bases, or related documents (generally referred to herein as "policies") are not confidential. We understand your position to be that it promotes "efficiency" to use the names of Uber policies identified in the MDL in other cases because you believe Uber is improperly failing to produce those policies in other litigation.

We asked for confirmation that you were not claiming that any particular document produced by Uber in the MDL was improperly designated as Confidential or Highly Confidential – Attorney's Eyes Only. You confirmed that this is not your position.

We then attempted to determine whether you contend that Uber policy names are not confidential even when the policy name was identified by reviewing the content of a Confidential MDL document. As an example, we shared an image of one Confidential MDL document, UBER_JCCP_MDL_000250806. We asked (twice) whether you agreed that the content of this document was confidential under the Protective Order. You did not answer this question, asked us to take the image down, and indicated that you did not believe it was productive to discuss specific documents. Instead, you reiterated your position that the names of Uber's policies are not confidential and invited Uber to file a motion if it disagreed.

When we ended the call, we agreed to try to identify a compromise that would avoid the need for court intervention and invited you to do the same. Unfortunately, based on your position, we are unable to identify a compromise on the substance of the dispute. Based on our understanding of your position, there appears to be no limiting principle that would prevent MDL plaintiffs' counsel from reviewing millions of pages of confidential MDL production to identify the names of documents they wish to request in other matters.

If we have misstated your position above, please let us know.

While we were not able to identify a compromise on the substance of the dispute, we do have a proposal to "agree to disagree" as follows:

1. You confirm that the only cases in which the names of Uber policies identified in the MDL have been used are the *Smith* and *Lord* cases identified in our letter; and,
2. You agree that before using the names of Uber policies or other information from confidential documents identified in the MDL in any other case, you will seek either Uber's permission or permission from the MDL Court.

Please let us know your position on this proposal or whether you have any other compromise suggestions.

Veronica G. Gromada

Partner

Shook, Hardy & Bacon L.L.P.

713-546-5683 | vgromada@shb.com



From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Monday, June 30, 2025 3:32 PM

To: Bret Stanley <bstanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

EXTERNAL

Veronica,

I'll be handling this issue on behalf of the PSC. My understanding was the meet and confer is at 5 EST. If that is correct, can you please forward me the invite. If not, I'm available tomorrow morning to meet and confer on this issue.

Thank you,
Steve

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Monday, June 30, 2025 4:08 PM

To: Bret Stanley <bstanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrums@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Veronica,

I did not receive the Zoom invitation for the meet and confer on this issue - can you please forward it?

Thank you,
Steve

From: Bret Stanley <bstanley@johnsonlawgroup.com>

Sent: Thursday, June 19, 2025 9:23 AM

To: Steven Cohn <cohn@chaffinluhana.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

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Subject: RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Veronica – can your team meet tomorrow on this?



Bret Stanley | Senior Counsel

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From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Wednesday, June 18, 2025 11:10 AM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrums@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi

<kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
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[EXTERNAL]

Veronica,

Unfortunately, those times today do not work for us. Does 2pm EST on Friday work? If not, please let us know your availability on Friday.

Thanks,
Steve

Steven Cohn | Partner

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P: [\(347\) 269-4465](tel:(347)269-4465)

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ChaffinLuhanaFoundation.org



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A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Tuesday, June 17, 2025 4:55 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

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<mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Counsel,

Please advise if Plaintiffs are available for a meet and confer tomorrow between 10am-12pm CT or 4-6pm CT regarding Bret Stanley's Protective Order violations.

Thank you.

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Wednesday, June 4, 2025 2:24 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

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EXTERNAL

Counsel,

Please see the attached correspondence.

Regards,
Steve

Steven Cohn | Partner

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